

From: CE Brown [mailto:cebrown@mcn.org]
Sent: Monday, March 17, 2008 12:03 PM
To: MLPAComments
Subject: MLPA Comment from an owner at The Sea Ranch

I appreciate and support the purpose of the MLPA to protect the natural diversity and abundance of marine life, but the unfortunate reality of what is presently happening in the process is the sacrifice of that goal in favor of political pressure for public access, while failing to improve upon existing protections. The Act itself makes no mention of public access, but that focus has been written into the Master Plan by staff at the request of stakeholders. In this area, private landowners have been excluded as stakeholders, including approximately 2,000 private landowners at The Sea Ranch, who are owners in common of 10 miles of coastline.

I've been an owner at The Sea Ranch for more than 20 years, and share the stewardship values of other private landowners along this beautiful North Coast. We realize the magnificent treasure we hold in safe keeping for the future.

Here at The Sea Ranch we do have one significant difference from our neighboring private landowners, because public access across our private lands has been imposed by law. We have borne the costs and difficulties associated with that access in terms of increased needs for monitoring and security and difficulties associated with trespass and vandalism. We've borne these burdens with our own funds, in addition to paying high property taxes. As owners and stewards of these lands and the marine environments adjacent, we have done an admirable job of respectful use by owners and their invited guests and renters. That should continue, as it should on neighboring private lands. **What is needed is appropriate control of the public's taking of our abalone, which is the main source of the problems.**

The proposed MPAs along the North Coast are in areas which have already been protected for generation upon generation of wise stewardship using private funds, while leaving the public access areas unprotected and subject to further depletion. There is no benefit to be derived by simply putting new MPA labels on old problems, and further entrenching the status quo of depletion due to public access.

I do understand that the MLPA process is limited to the size and spacing of protected areas, and that the stated goal is to use the best available science. But the "science" is woefully absent, without even the most basic studies of these Northern marine environments, and assumptions are being made based on studies of southerly areas, not appropriate for the unique climates and marine cultures of this ecological treasure on the North Coast.

Since the reserve designations are already set by law, we must work within those confines to create a solution that approximates common sense and wise stewardship. I urge you to shift the proposed MPA designations to areas of public access, and leave the marine interface on private lands in the care of the private owners who are remarkably

effective and wise stewards of the resources, without public costs. The private owners have been operating *de facto* marine sanctuaries for generations, at their own cost.

Since our imposed public access here at The Sea Ranch creates a peculiar situation, my suggestion for a solution is to designate MPAs selectively at those points where the greatest public usage has depleted our ecosystems, and leave the rest of The Sea Ranch open for the use of the owners and their guests and renters. In addition, I suggest that the State Marine Preserve area we already have at Del Mar Point be confirmed to protect the seal rookery, tidepools and other resources that have been vigorously protected by The Sea Ranch community for nearly 40 years.

Before any MPAs are designated, appropriate site-specific baseline studies with measurable data, and replicable research designs, must be conducted. Otherwise, no outcome studies can be valid, and no scientific basis for policy choices can be in effect. Without appropriate biological studies we will have only a political process of choosing closure areas based on political pressure. Such a process cannot protect the natural wonders we have here, and cannot produce the laudable goals of the MLPA. The Northern California coastline and unique marine environments are natural treasures, and are worth much more than the well-intentioned but woefully non-science based options that are presently proposed. You need to put this process in abeyance until the necessary data has been collected and analyzed so that the intent of the MLPA will indeed help, rather than hurt marine ecosystems which have been degraded by overuse.

It simply does not make sense to restrict the taking of marine resources adjacent to private lands which have been exceedingly well managed and produced vibrantly healthy ecosystems, while continuing to provide unmitigated public access to abalone and fishing in areas which have already suffered depletion. Restrict the depleted areas so that they can recover and the ecosystems can flourish again, and when measurable success has been achieved, then re-open those areas to public use, but with wiser restrictions in place.

Sincerely,

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